REMARKS

Applicant hereby traverses the outstanding rejections, and requests reconsideration and withdrawal in light of the remarks contained herein. Claims 1-21 are pending in this application.

Rejection under 35 U.S.C. § 103

Claims 1-21 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Knutson et al. ('746, hereinafter Knutson) in view of Bleizeffer et al. ('371, hereinafter Bleizeffer).

To establish a prima facie case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art cited must teach or suggest all the claim limitations. See M.P.E.P. § 2143. Without conceding the second criteria, Applicant asserts that the rejection does not satisfy the first and third criteria.

Lack of Motivation

The Office Action admits that Knutson does not explicitly teach a second generator, operably linked through a second interface to one or more associated second type components, which invokes at least one second type component to generate a report element of a second type. The Office Action attempts to cure this deficiency by introducing Bleizeffer, which the Office Action alleges to teach having such an element. The motivation for making the combination was presented as follows:

> "It would have obvious ... to combine the teachings of Knutson with the teachings of Bleizeffer so as to obtain the graph generator generating the desired graphic format report via GUI. The motivation being to allow user [sic] to made [sic] decisions based on the generating [sic] a report."

It is well settled that the fact that references can be combined or modified is not sufficient to establish a prima facie case of obviousness, M.P.E.P. § 2143.01. In describing the teachings of Knutson, the Examiner states that Knutson teaches graph creation and a GUI. Consequently, the graph generator and GUI of Bleizeffer are duplicative in view of the teachings of Knutson, and thus a combination of Knutson and Bleizeffer is not desirable as such a combination would not provide any benefit to the teaching of Knutson. Moreover, Applicant notes that Knutson allows a user to make decisions, see the Abstract, lines 3-5. Thus, the stated motivation of allowing a user to make decisions also does not require the teachings of Bleizeffer. Consequently, the language of the motivation is merely a statement that the reference can be modified, and does not state any desirability for making the modification. Even assuming that the references can be combined or modified, this does not render the resultant combination obvious unless the prior art also suggests the desirability of the combination. In re Mills, 916 F.2d 680, 16 U.S.P.Q.2d 1430 (Fed. Cir. 1990), as cited in M.P.E.P. § 2143.01. Thus, the motivation provided by the Examiner is improper, as the motivation must establish the desirability for making the modification.

No valid suggestion has been made as to why a combination of Knutson and Bleizeffer is desirable. Therefore, the rejection of claims 1-21 should be withdrawn.

Lack of All Limitations

The Office Action admits that Knutson does not explicitly teach a second generator, operably linked through a second interface to one or more associated second type components, which invokes at least one second type component to generate a report element of a second type. The Office Action attempts to cure this deficiency by introducing Bleizeffer, which the Office Action alleges to teach having such an element. However, this combination, as presented, does not teach or suggest all limitations of the claimed invention.

Claim 1 defines a computer-implemented report generation system having a first generator, operably linked through a first interface to one or more associated first type components, which invokes at least one first type component to generate a report element of a first type, and a second generator, operably linked through a second interface to one or more associated second type components, which invokes at least one second type component to

generate a report element of a second type. The combination of Knutson and Bleizeffer do not teach at least these limitations. The Office Action states that Knutson teaches text generation as the report element of the first type. The Office Action then relies upon Bleizeffer as teaching graph generation as a report element of the second type. The combination of references does not teach a first interface and a second interface as claimed. Knutson does not appear to teach a structure that corresponds the claimed interface. Moreover, the Office Action specifically admits that Knutson does not teach a second interface. Bleizeffer teaches a text-based report generator 60 and a graph generator 62, but both are shown only to connect with GUI 66. Thus, Bleizeffer also does not teach a first interface and a second interface as claimed. Thus, the combination of references do not teach all of the claimed limitations. Therefore, the Applicant respectfully asserts that for the above reasons claim 1 is patentable over the 35 U.S.C. § 103(a) rejection of record.

Claim 12 defines a report generation system implemented on one or more computers, having a first generator, operably linked through a first interface to one or more associated first type components for invoking at least one first type component to generate a report element of a first type, and a second generator, operably linked through a second interface to one or more associated second type components for invoking at least one second type component to generate a report element of a second type. The combination of Knutson and Bleizeffer do not teach at least these limitations. The Office Action states that Knutson teaches text generation as the report element of the first type. The Office Action then relies upon Bleizeffer as teaching graph generation as a report element of the second type. The combination of references does not teach a first interface and a second interface as claimed. Knutson does not appear to teach a structure that corresponds the claimed interface. Moreover, the Office Action specifically admits that Knutson does not teach a second interface. Bleizeffer teaches a text-based report generator 60 and a graph generator 62, but both are shown only to connect with GUI 66. Thus, Bleizeffer also does not teach a first interface and a second interface as claimed. Thus, the combination of references do not teach all of the claimed limitations. Therefore, the Applicant respectfully asserts that for the above reasons claim 1 is patentable over the 35 U.S.C. § 103(a) rejection of record.

Claims 2-11 and 13-17 depend from base claims 1 and 12, respectively, and thus inherit all limitations of their respective base claims. Each of claims 2-11 and 13-17 sets

forth features and limitations not recited by the combination of Knutson and Bleizeffer. Thus, the Applicant respectfully assert that for the above reasons claims 2-11 and 13-17 are patentable over the 35 U.S.C. § 103(a) rejection of record.

In view of the above, each of the presently pending claims in this application is believed to be in immediate condition for allowance. Accordingly, the Examiner is respectfully requested to pass this application to issue.

Applicant believes no fee is due with this response. However, if a fee is due, please charge our Deposit Account No. 08-2025, under Order No. 10005480-1, from which the undersigned is authorized to draw.

Dated: July 7, 2004

I hereby certify that this correspondence is being deposited
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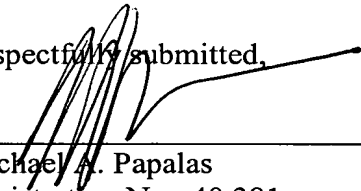Alexandria, VA 22313-1450, on the date shown below.

Dated: July 7, 2004

Signature: _____
                Lisa J. Collins

Respectfully submitted,

By_____
Michael A. Papalas
Registration No.: 40,381
Attorney for Applicant

(214) 855-8186